IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

AMERICAN CLOTHING EXPRESS,)	
INC. D/B/A ALLURE BRIDALS AND		
JUSTIN ALEXANDER, INC,)	
)	
Plaintiffs,)	
) Case No. 2:20-cv-02007-SHM-d	kv
V.)	
) Judge Mays	
CLOUDFLARE, INC. and DOES 1-200,) Ch. Magistrate Judge Vescovo	
INCLUSIVE,)	
Defendants.		

SPECIALLY-APPEARING DEFENDANT CLOUDFLARE, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Specially-Appearing Defendant Cloudflare, Inc., by and through counsel, hereby moves the Court for an extension of time of thirty (30) days from the current deadline of February 19, 2020, to answer, move, or otherwise respond to Plaintiffs' Complaint. Counsel for Specially-Appearing Defendant Cloudflare, Inc. has conferred with counsel for Plaintiffs, and is authorized to state that this request is unopposed. A proposed Order is submitted herewith.

Respectfully submitted,

s/Robb S. Harvey

Robb S. Harvey (Tenn. BPR No. 11519) WALLER LANSDEN DORTCH & DAVIS LLP 511 Union Street, Suite 2700

Nashville, Tennessee 37219

Phone: (615) 244-6380

Email: robb.harvey@wallerlaw.com

Local counsel for Specially Appearing Defendant Cloudflare, Inc.

¹ Specially appearing Defendant Cloudflare, Inc. expressly reserves and does not waive any defenses (including, but not limited to, personal or subject matter jurisdiction, venue, failure to state a claim, and insufficiency of service), objections, rights or claims.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 10, 2020, a true and exact copy of the foregoing has been served via the Electronic Case Filing system of the United States District Court for the Western District of Tennessee, which is expected to send email notification of such filing to all counsel who have made an appearance, including the following:

Russell Bogart (NY #2856078) Kagen & Caspersen, PLLC 757 Third Avenue, 20th Floor New York, New York 10017 rbogart@kagencaspersen.com

Grady Garrison
Nicole Berkowitz
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
ggarrison@bakerdonelson.com; nberkowitz@bakerdonelson.com

s/Robb S. Harvey

Local Counsel for Specially Appearing Defendant Cloudflare, Inc.